

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN, et al.,

Plaintiffs,

V.

TRANSPORTATION SECURITY
ADMINISTRATION, et al.,

Defendants.

CASE NO. 2:20-cv-00064-MJH-LPL

JOINT MOTION FOR PROTECTIVE ORDER

Plaintiffs and Government Defendants jointly move for entry of a protective order that would facilitate the Drug Enforcement Administration (DEA) producing in discovery some sensitive law enforcement information and law enforcement investigative techniques and analysis.

1. There is good cause to enter the protective order jointly proposed by Plaintiffs and the Government Defendants. Some of the documents responsive to Plaintiffs' discovery requests include such information, and it would serve the interests of the parties for DEA to be able to produce such information to Plaintiffs' counsel without the information becoming public.

2. Accordingly, the parties respectfully request that the Court enter the attached proposed protective order.

Dated: August 31, 2021

/s/ Dan Alban

Dan Alban* (VA Bar No. 72688)
Jaba Tsitsuashvili* (DC Bar No. 1601246)

Institute for Justice
901 North Glebe Rd., Suite 900
Arlington, VA 22203
(703) 682-9320
(703) 682-9321 (fax)
dalban@ij.org
jtsitsuashvili@ij.org

*Admitted *Pro Hac Vice*

Counsel for Plaintiffs

Respectfully submitted,

BRIAN M. BOYNTON
Acting Assistant Attorney General

BRIGHAM J. BOWEN
Assistant Director
Civil Division, Federal Programs Branch

/s/ Galen N. Thorp

GALEN N. THORP (VA Bar # 75517)
Senior Trial Counsel
ELIZABETH TULIS
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, D.C. 20530
Tel: (202) 514-4781 / Fax: (202) 616-8460
galen.thorp@usdoj.gov

Counsel for Government Defendants